

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

C.A. Nos. 6:19-cv-00254, -00255, -00256-  
ADA

**DECLARATION OF GREGORY H. LANTIER IN SUPPORT OF  
INTEL CORPORATION'S MOTION TO TRANSFER VENUE WITHIN THIS  
DISTRICT**

I, Gregory H. Lantier, hereby declare as follows:

1. I am an attorney admitted to practice in the State of New York, the District of Columbia, and the Commonwealth of Virginia, and have been granted admission *pro hac vice* in these actions.

2. I am a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”). WilmerHale is counsel for Defendant Intel Corporation (“Intel”).

3. I provide this declaration in support of Intel’s motion to transfer venue within this District. Unless otherwise indicated below, the statements in this declaration are based on my personal knowledge and investigation. If called to testify as a witness, I could and would competently do so under oath.

**Location of Inventors**

4. The named inventors of the ’357 patent are David Burnett, Prashant Kenkare, Andrew C. Russell, Shayan Zhang, Michael D. Snyder, and Hema Ramamurthy. Based on

investigation, each of these inventors works in Austin, Texas and resides in or near Austin. True and correct copies of the LinkedIn profiles of these six inventors are attached as **Exhibits 1-6**.

5. The named inventors of the '025 patent are Robert Ehrlich, Craig Shaw, and Brett Murdock. As stated in Mr. Herrgott's declaration filed herewith, Mr. Ehrlich works at Intel's Austin facility and resides in Austin. *See* Herrgott Decl. ¶ 6. Based on investigation, Craig Shaw and Brett Murdock also work in Austin, Texas and reside in or near Austin. True and correct copies of the LinkedIn profiles of these three inventors are attached as **Exhibits 7-9**.

6. The named inventors of the '373 patent are Bradford L. Hunter, Andrew C. Russell, Shayan Zhang, and David Bearden. Based on investigation, each of these inventors works in Austin, Texas and resides in or near Austin. A true and correct copy of the LinkedIn profile of Mr. Hunter is attached as **Exhibit 10**. *See also* D.I. 41-1 ¶ 11 (Bearden); *supra* ¶ 4 (Russell, Zhang).

7. The named inventors of the '485 patent are Olga Lowe (formerly Lu), Lawrence Childs, and Craig Gunderson. As stated in Mr. Herrgott's declaration filed herewith, Ms. Lowe works at Intel's Austin facility and resides in Austin. *See* Herrgott Decl. ¶ 6. Based on investigation, Lawrence Childs and Craig Gunderson also work in Austin, Texas and reside in or near Austin. True and correct copies of the LinkedIn profiles of these three inventors are attached as **Exhibits 11-13**.

8. The named inventors of the '522 patent are Marcus May and Daniel Mulligan. Based on investigation, each of these inventors works in Austin, Texas and resides in or near Austin. True and correct copies of the LinkedIn profiles of these two inventors are attached as **Exhibits 14 and 15**.

9. The named inventors of the '187 patent are Marcus May and Michael May. Based on investigation, each of these inventors works in Austin, Texas and resides in or near Austin. A true and correct copy of Michael May's LinkedIn profile is attached as **Exhibit 16**.

10. The sole named inventor of the '983 patent is Kevin Locker. As stated in Mr. Herrgott's declaration filed herewith, Mr. Locker works at Intel's facility in Chandler, Arizona. *See* Herrgott Decl. ¶ 6. A true and correct copy of Mr. Locker's LinkedIn profile is attached as **Exhibit 17**.

11. The sole named inventor of the '759 patent is Matthew Henson. Mr. Henson is deceased. A true and correct copy of Mr. Henson's LinkedIn profile is attached as **Exhibit 18**.

#### **Other Documents Cited**

12. Attached hereto as **Exhibit 19** is a true and correct copy of the transcript of the July 31 hearing on Intel's motion to transfer.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on August 14, 2019



---

Gregory H. Lantier

